

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
LAFAYETTE DIVISION

LAURA KORTY,	)	
	)	
PLAINTIFF,	)	
	)	
v.	)	CASE NO.: 4:21-CV-33
	)	
INDIANA UNIVERSITY HEALTH, INC.,	)	
	)	
DEFENDANT.	)	

**COMPLAINT AND DEMAND FOR JURY TRIAL**

Laura Korty brings this action against Indiana University Health, Inc. (“IU Health”) for violation of the Equal Pay Act.

**PARTIES**

1. Korty is an individual who resides in Tippecanoe County, Indiana.
2. Indiana University Health, Inc. is an Indiana nonprofit corporation with its principal office at 340 W. 10<sup>th</sup> Street, Indianapolis, Indiana.

**JURISDICTION AND VENUE**

3. This Court properly has jurisdiction over this matter under 28 U.S.C. §1331 because Korty is asserting a federal question under the Equal Pay Act.
4. This Court is a proper venue for this matter because IU Health may be found in this judicial district and a substantial portion of the events giving rise to Korty’s claim occurred within this judicial district.

**EQUAL PAY ACT COVERAGE**

5. Korty was an employee within the meaning of the Equal Pay Act, 29 U.S.C. §203.
6. IU Health is an employer within the meaning of the Equal Pay Act, 29 U.S.C. §203

**FACTUAL ALLEGATIONS**

7. Korty is female.
8. Starting in approximately October 2017, Korty began working in her current position for IU Health.
9. Korty voluntarily separated her employment on April 26, 2021.
10. Since Korty announced her exit from her position, she has remained on to train her male replacement.
11. Korty has been a nurse longer than her male replacement.
12. Though a master's degree is not required for the position, both Korty and her male replacement have master's degrees which they earned at approximately the same time.
13. Korty's male replacement officially took over her duties on April 11, 2021.
14. Korty's male replacement is being paid \$15,000.00 per year more than Korty.
15. Korty and her male replacement performed or will perform equal work under similar working conditions.
16. The pay disparity is not due to a seniority system.
17. The pay disparity is not due to merit.
18. The pay disparity is not due to a quality or quantity production system.
19. The pay disparity is not due to some factor other than sex.
20. The pay disparity is because of sex.

**COUNT I: VIOLATION OF THE EQUAL PAY ACT**

21. In violation of the Equal Pay Act, IU Health has paid and will continue paying Korty's male replacement \$15,000.00 per year more than Korty for equal work under similar working conditions.
22. This pay disparity between Korty and her male replacement has harmed Korty.
23. IU Health has acted willfully in violating the Equal Pay Act with respect to Korty.

**PRAYER FOR RELIEF**

WHEREFORE Korty demands judgment against IU Health, including:

- a. Her under-paid wages;
- b. Liquidated damages;
- c. Attorney's fees;
- d. The costs of this action;
- e. Such other relief as this Court determines to be necessary and appropriate.

/s/ Jason R. Ramsland

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Attorney for Plaintiff

**Demand for Jury Trial**

Plaintiff demands trial by jury.

/s/ Jason R. Ramsland